

**ORIGINAL**  
IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED  
2016 MAY -5 AM 9:13

UNITED STATES OF AMERICA

NO.

V.

ALTON ALEXIS

**3-16 CR-0188 D**

**INFORMATION**

The United States Attorney Charges:

At all times material to the information:

**Introduction**

1. In January of 2010, **Alton Alexis** (on behalf of borrower NSAA Investment Group) signed a promissory note with One World Bank for a loan of approximately \$3.7 million to finance the construction of a movie theater restaurant. One World Bank was located in the Northern District of Texas at 2449 Walnut Hill Lane, Dallas, Texas. During the period from early 2010 through early 2011, **Alexis** caused over \$2 million in loan proceeds to be disbursed from One World Bank to bank accounts controlled by **Alexis** in the name of BBA Construction Company and/or to NSAA Investment Group.

2. **Alton Alexis** later caused at least \$245,000 of these loan proceeds to be fraudulently diverted into several bank accounts controlled by **Alexis**. These diverted loan proceeds were later used by **Alexis** to pay his personal expenses. **Alexis** fraudulently disbursed these (and possibly other) loan proceeds without the knowledge or consent of

lender One World Bank.

3. During the period from February through July of 2010, **Alexis** submitted fictitious invoices to cause at least \$245,000 of loan proceeds to be fraudulently disbursed to pay for **Alexis's** personal debts. **Alexis** concealed this \$245,000 fraudulent disbursement by submitting three fictitious invoices which falsely represented to lender One World Bank that loan proceeds should be disbursed to "Wong Steel, Inc." to pay for steel materials related to the construction project. Based on these phony invoices, **Alexis** received the following fraudulent disbursements: \$100,000 in February of 2010; \$85,000 in May of 2010; and \$60,000 in July of 2010.

4. On March 11, 2011, defendant **Alton Alexis**, acting *pro se* (without counsel), filed under penalty of perjury a voluntary bankruptcy petition in Case Number 11-31701-hdh7 with the United States Bankruptcy Court in the Northern District of Texas, Dallas Division.

5. On March 11, 2011, defendant **Alton Alexis**, acting *pro se* (without counsel), also filed under penalty of perjury in the same case other related bankruptcy documents, including his Statement of Financial Affairs and bankruptcy schedules.

6. On May 22, 2011, defendant **Alton Alexis**, represented by counsel, filed under penalty of perjury an *amended* voluntary bankruptcy petition in Case Number 11-31701-hdh7 with the United States Bankruptcy Court in the Northern District of Texas, Dallas Division.

7. On May 22, 2011, defendant **Alton Alexis**, represented by counsel, filed under penalty of perjury an *amended* Statement of Financial Affairs in Case Number

11-31701-hdh7 with the United States Bankruptcy Court in the Northern District of Texas, Dallas Division.

8. On May 22, 2011, defendant **Alton Alexis** made a false statement under penalty of perjury in Question Number Two of his *Amended* Statement of Financial Affairs when **Alexis** fraudulently concealed at least \$245,000 of his 2010 personal income from the bankruptcy court, the United States Trustee, and his creditors. Although **Alexis** knew that he was obligated to disclose all income **Alexis** received in 2010 and 2011, **Alexis** unlawfully and fraudulently concealed his receipt of at least \$245,000 of income which **Alexis** obtained through his fraudulent diversion of One World Bank loan proceeds.

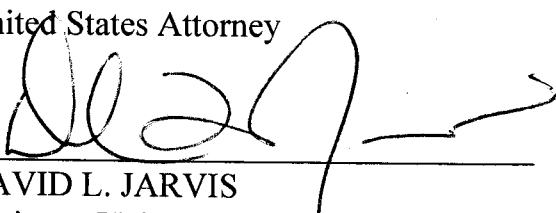
Count One  
False Statement Under Penalty of Perjury  
(Violation of 18 U.S.C. § 152(3))

On or about May 22, 2011, within the Northern District of Texas and elsewhere, defendant **Alton Alexis**, knowingly and fraudulently made a material false statement under the penalty of perjury, as permitted by Section 1746 of Title 28, United States Code, in and in relation to a case under Title 11, United States Code, *In re Alton Alexis and Althea Lynette Alexis*, Case Number 11-31701-hdh7, when **Alexis** filed an Amended Statement of Financial Affairs which falsely represented in Question Number Two that Alexis had truthfully disclosed all income received in the two years immediately preceding the commencement of the case in March of 2011. Instead of making truthful disclosure of all income, **Alexis** fraudulently concealed that he received at least \$245,000 of income in 2010 when **Alexis** fraudulently diverted loan proceeds from a loan from One World Bank and used these funds for his personal benefit.

In violation of 18 U.S.C. § 152(3).

Respectfully submitted,

JOHN R. PARKER  
United States Attorney



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